

Gregory Gilmer Jr.
Jefferson County Justice Center
911 Casey Avenue
Mount. Vernon, Illinois 62864

Sent via U.S. Mail:
United States District Court
Attn: Office of the Clerk
750 Missouri Ave
East Saint Louis, IL 62201

Re: EMERGENCY MOTION FILING
2014-CR-30141-SMY

Dear Madam or Sir Clerk,

Please find enclosed a motion for emergency release custody pending the revocation proceeding.

Can you please send me back a filed stamped copy as the facility I am currently in is operating on a modified schedule due to the coronavirus pandemic and it is very difficult to get with staff to make copies for me?

Thank you for your time and attention.

Respectfully Submitted,

s/ *Gregory Gilmer, Jr.*
Gregory Gilmer Jr.

Enclosures included.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

Gregory Gilmer, Jr

Defendant,

v.

CASE: 2014-cr-30141-SMY

United States of America,

Plaintiff.

MOTION FOR EMERGENCY RELEASE WITH URGENT HEARING

Defendant, Gregory Gilmer, ("Mr. Gilmer") files this motion but first ask that it be construed liberally pursuant to *Haines v. Kerner*, 404 U.S 519, (1972). Mr. Gilmer files this motion to emergency release pending the revocation proceeding.

In support thereof M Brown states the following facts:

Comes now Gregory Gilmer Jr and his Motion for Emergency Release, and states:

1. I am currently in US Marshal custody awaiting a Judicial Proceeding and am not facing new criminal charges.
2. I humbly ask for release on personal recognizance under conditions pursuant to 18 USC 3142(c) for the following reason(s):
 - (a) My wife passed away on 9/24/2021, and the welfare of our minor child is at stake.
 - (b) Our son's support system is limited to that of his parents.
3. I ask the Court to grant this request given that I do not pose a threat to the community and have not acquired any new charges in addition to my emergent family situation.
4. I can satisfy any condition of release reasonably necessary to assure court appearance as well as the safety of the community.

CONCLUSION

WHEREAS I pray that the court grant this Motion as proposed in the above as it sees just and proper.

Respectfully,

s/ Gregory Gilmer, Jr.

Gregory Gilmer Jr.